

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN**

Andrea West,  
Plaintiff,

v.

Christine E. Wormuth,  
Secretary of the Army,  
Defendant.

Civil Action No.  
Judge:  
Magistrate Judge:

Jury Trial Demand

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Dionne E. Webster-Cox (P70422)  
WEBSTER LAW OFFICE, PLLC  
Attorney for Andrea West  
24100 Southfield Rd. – Ste. 100  
Southfield, MI 48075  
734-215-2444 / 734-943-6069 – FAX  
[DEWC@WebsterLawOfficePLLC.com](mailto:DEWC@WebsterLawOfficePLLC.com)

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**COMPLAINT**

1. Andrea West lives in the City of Grosse Pointe, which is located in Wayne County, Michigan.
2. Christine E. Wormuth is Secretary of the Army.
3. Plaintiff brings claims in this lawsuit under Title VII of the Civil Rights Act of 1964 (Title VII).

4. Jurisdiction is proper in this court under 28 USC 1331, which authorizes federal courts to decide cases concerning federal questions; 28 USC 1343 (a)(3) and (4), which authorizes federal courts to hear civil rights cases.
5. Venue is proper because the parties reside in, and the majority of the events alleged took place in, the Eastern District of Michigan.
6. Plaintiff received the right to sue from the Equal Employment Opportunity Commission. **(Exhibit A – 03/11/2024 EEOC Decision)**
7. Plaintiff was at all relevant times employed by Integrated Logistics Support Center (ILSC) at the Detroit Arsenal, Michigan.
8. Plaintiff is an African American woman.
9. Maxim Alaweih, a Caucasian man, is an Army Watercraft Systems Branch Chief and acts as the selecting official for promotional and hiring processes.
10. LaShonda Coffee, an African American woman, is a Supervisory Logistics Manager and acts as a panel member for promotional and hiring processes.
11. Michelle Carroll, a Caucasian woman, is a Product Support Manager and acts as a panel member for promotional and hiring processes.
12. Andrea Valente, a Caucasian woman is a Supervisory Human Resources Specialist who acts as a human resource subject matter expert for promotional and hiring processes.
13. Plaintiff began her employment at Department of the Army in 2003.

**COUNT I  
TITLE VII VIOLATION**

Plaintiff incorporates the above allegations by reference.

14. 42 USC 1983 prohibits discrimination by a municipal employer by denying the employee her equal protection or due process rights under the 14<sup>th</sup> Amendment.
15. Federal Statute 42 USC 1983 provides for a private cause of action for monetary and/or injunctive and declaratory relief whenever a “state actor” violates one’s constitutional or federally protected rights.
16. On September 28, 2020, Plaintiff applied for a Logistics Specialist position.
17. Two weeks after her interview, Plaintiff learned that she was not selected for the position by seeing a notice on USAJobs.
18. Plaintiff learned that Sarah Schlauch was selected for the Logistics Specialist position.
19. Ms. Schlauch is a Caucasian woman who has worked for TACOM for seven years.
20. Plaintiff has been employed at TACOM for 19 years.
21. Plaintiff has significantly more education than Ms. Schlauch, including a 10-point veterans preference status and a dual master’s degree. **(Exhibit B – Plaintiff’s resume)**

22. In fact, Plaintiff's resume specifically addresses her ability to apply integrated product support elements to the life cycle management.
23. Plaintiff believes she was more qualified than the selectee, Ms. Schlauch.  
**(Exhibit C – Schlauch resume)**
24. Plaintiff spoke with Mr. Alaweih to discuss why she was not selected for the position.
25. Although Mr. Alaweih stated that Plaintiff was not selected because she did not provide complete and accurate responses to the interview questions, he could not identify the specific questions she failed to provide adequate responses to.
26. By not being selected for the position, Plaintiff was prevented from advancing in her career at the Department of the Army and receiving additional pay.
27. While neutral on its face, Defendant Agency maintains an unofficial practice of promoting less qualified Caucasian women over African American women with more tenure, education, and experience.
28. As a result of this discrimination, Plaintiff suffered extreme emotional trauma.

**COUNT II**  
**ELLIOT-LARSEN CIVIL RIGHTS ACT**

Plaintiff incorporates the above allegations by reference.

29. Elliot-Larsen Civil Rights Act 37.2102(1) states that “The opportunity to obtain employment ... without discrimination because of religion, race, color, national origin, age, sex, height, weight, familial status, or marital status as prohibited by this act, is recognized and declared to be a civil right.”
30. Plaintiff asserts that Department of the Army discriminated against her based on her race and age.
31. Ms. Schlauch was selected for the Logistics Specialist position over Plaintiff although she has significantly less experience and is 20 years younger than Plaintiff.
32. Additionally, Ms. Schlauch had a personal relationship with Mr. Alaweih which likely contributed to her selection.

PLAINTIFF REQUESTS that the Court:

- a. Award damages to Plaintiff that reflect her economic losses,
- b. Award Plaintiff compensatory damages for her humiliation,
- c. Award Plaintiff punitive damages reflecting the blatant disregard

Defendant demonstrated for Plaintiff's rights under Title VII and constructive discharge,

- d. Award Plaintiff attorney fees, witness fees, interest, and costs; and
- e. Grant any other relief the Court deems appropriate and/or necessary.

Respectfully submitted,

Date: May 16, 2024

/s/ Dionne E. Webster-Cox  
Dionne E. Webster-Cox (P70422)  
Attorney for Plaintiff  
24100 Southfield Rd. – Ste. 100  
Southfield, MI 48075  
734-215-2444 / 734-943-6069 – FAX  
DEWC@WebsterLawOfficePLLC.com

I, Andrea West, certify that I have read the complaint a knowingly agree with the contents to the best of my ability.

Andrea West

Andrea West (May 16, 2024 14:16 EDT)

Andrea West

# Exhibit A



**DEPARTMENT OF THE ARMY**  
**OFFICE OF THE ASSISTANT SECRETARY**  
**MANPOWER AND RESERVE AFFAIRS**  
**111 ARMY PENTAGON**  
**WASHINGTON, DC 20310-0111**

March 11, 2024

Equity & Inclusion

Dean Yeotis  
611 West Court Street  
Flint, Michigan 48503

Complaint of Andrea West v.  
Christine E. Wormuth, Secretary of the Army  
DA Docket Number: ARDETROIT21FEB00699  
EEOC Case Number: 471-2024-00014X

Dear Mr. Yeotis:

This is the Department of the Army's final decision in your client's (hereafter "Complainant") equal employment opportunity (EEO) complaint, which was filed on April 1, 2023, with the U.S. Army Garrison – Detroit Arsenal EEO Office.

**Final Decision**

Pursuant to my authority to decide this matter on behalf of the Secretary of the Army, I find Complainant was not the victim of discrimination based upon the evidence in the case file and for the reasons cited below. Since Complainant is not a prevailing party, she is not entitled to any relief, including attorney's fees or costs.

**Procedural and Factual Background**

Complainant alleged that she was discriminated against on the bases of race (Black/African American) and age (YOB 1967, 54-years-old) when on January 8, 2021, she was not selected for a GS-0346-13, Logistics Management Specialist position on vacancy announcement #NEAD20504486-4030(R) by the selecting official, Maxim Alaweih<sup>1</sup>.

Involved in this claim are:

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<sup>1</sup> During the investigation, Complainant removed sex as a basis of discrimination (See Email Correspondence at Investigative File [IF] page [p] 400).



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- Maxim Alaweih (race: Other, born 1975), Army Watercraft Systems Branch Chief, NH-0346-04, Selecting Official (IF pages [pp] 404-405).
- LaShonda Coffee (race: African American, born 1976), Supervisory Logistics Management, NH-0346-03, Panel Member (IF pp 412-413).
- Michelle Carroll (race: White/Caucasian, born 1979), Product Support Manager, NH-0346-04, Panel Member (IF pp 420-421).
- Andrea Valente (race: White, born 1987), Supervisory Human Resources Specialist, NH-0301-04, Human Resources Subject Matter Expert (IF pp 427-428).

During the period at issue, Complainant worked as a Technical Writer at the Integrated Logistics Support Center (ILSC), at the Detroit Arsenal, Michigan. Complainant states her race is African-American, her sex is female, and she was born in 1967 (IF p 396). On September 28, 2020, Complainant applied for the position of Logistics Management Specialist under job announcement NEAD20304486-4030-R (IF pp 134-141). Complainant appeared on the certificate of eligible individuals that was sent to the selecting official, Maxim Alaweih, for consideration and Complainant received an interview for the position (see Certificate of Eligibles at IF p 129 and Interview Scoring Results at IF p 177). On December 15, 2020, Complainant learned she was not selected for the position (see Applicant Notification at IF p 370).

I note that an investigation was conducted by the Department of Defense Investigations and Resolutions Directorate. Complainant was notified of the option to request either a hearing before an Equal Employment Opportunity Commission (EEOC) Administrative Judge (AJ) or a final Army decision based upon the evidence in the case file. This decision is issued pursuant to Complainant's request to withdraw her hearing request and for an immediate final agency decision. The EEOC AJ dismissed Complainant's hearing request and ordered the Agency to prepare a final agency decision.

### **Legal Framework**

In any proceeding, either judicial or administrative, involving a charge of discrimination, it is Complainant's burden to prove that prohibited discrimination was the motivating factor in the actions or policies challenged. To satisfy this burden by circumstantial evidence, Complainant must first establish a *prima facie* case of discrimination. See *McDonnell Douglas Corporation v. Green*, 411 U.S. 792 (1973); *Furnco Construction Company v. Waters*, 438 U.S. 567 (1978). This means that Complainant must present a body of evidence such that, were it not rebutted, the finder of fact could conclude that unlawful discrimination did occur.

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The analysis in *McDonnell Douglas* prescribes that if Complainant meets her burden of presenting a *prima facie* case, then the employer or Agency must articulate some legitimate, nondiscriminatory reason(s) for its actions. That is, the employer must "...introduce evidence which, *taken as true*, would *permit* the conclusion that there was a nondiscriminatory reason for the adverse action." *St. Mary's Honor Center v. Hicks*, 509 U.S. 502, 509 (1993). Once the employer or Agency carries this burden of production, the presumption of discrimination created by the *prima facie* finding "drops from the case."

Complainant then must demonstrate that the proffered reason was not the true reason for the employment decision and that unlawful discrimination was. Complainant retains the ultimate burden of persuading the finder of fact that the Agency intentionally discriminated against Complainant.

To establish a *prima facie* case of discrimination based upon race, color, national origin, religion, sex, or age, Complainant must show: (1) that she is a member of a group(s) protected by Title VII of the Civil Rights Act of 1964, as amended; Age Discrimination in Employment Act (ADEA), as amended; (2) that she was adversely affected by an agency personnel decision, action or change; and (3) that she was treated less favorably than similarly situated individuals outside of her protected group(s) or, in the alternative, that there is some other evidence raising an inference of prohibited discrimination. In cases involving a claim of age discrimination, Complainant must show that age was a determining factor in the decision to take the adverse action against her.

To establish a *prima facie* case of discrimination based upon race, color, national origin, religion, or sex with regard to a promotion or hiring issue Complainant must show: (1) that she is a member of a group(s) protected by Title VII of the Civil Rights Act, as amended; (2) that she applied and was qualified for a job for which the employer was seeking applicants; (3) that despite those qualifications, she was not selected; and (4) that after the rejection, the position remained open and the employer continued to seek applications from persons of similar qualifications, or that she applied for a vacant position, for which she was qualified, but was rejected under circumstances which give rise to an inference of unlawful discrimination.

To establish a *prima facie* case of discrimination based upon age with regard to a promotion or hiring issue, Complainant must show: (1) that she is a member of the group protected by the Age Discrimination in Employment Act (ADEA), as amended; (2) that she applied and were qualified for a job for which the employer was seeking applicants; (3) that despite her qualifications, she was not selected; and (4) that after the rejection, the position remained open and the employer continued to seek applications from persons of similar qualifications, or that she applied for a vacant position, for which she was qualified, but was rejected under circumstances which give rise to an inference of unlawful discrimination.

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### ***Prima Facie* Case Analysis**

The EEOC has stated that in cases when the agency has established a legitimate, nondiscriminatory reason for its actions in meeting its burden on the merits, consideration of a *prima facie* case is not necessary. The EEOC has stated that the issue of discrimination may be resolved by determining whether the agency's reasons were a pretext for discrimination. *United States Postal Service Board of Governors v. Aikens*, 460 U.S. 711 (1993); see also *Thompson v. GSA*, EEOC Appeal No. 01953924 (March 13, 1997). Accordingly, we will proceed with the analysis, assuming for argument's sake, that a *prima facie* case of discrimination has been established.

### **Complainant's Assertions**

Complainant stated she applied for the Logistics Management Specialist position on September 28, 2020, and later learned she was not selected for the position. Complainant believed she was more qualified than the selectee, Sarah Schlauch (White, born: 1991), because Complainant has been employed at TACOM for 19 years and the selectee had worked for TACOM for seven years prior to the selection. Complainant stated she had more education than the selectee, and her resume specifically addressed her ability to apply integrated product support elements to the life cycle management and she believes the hiring official disregarded her 10-point veterans preference status and her dual master's degrees. She met with Mr. Alaweih to discuss her nonselection. She relayed that he stated to her that she was not selected because Complainant did not provide complete and accurate responses to the interview questions. However, she stated that Mr. Alaweih did not identify the specific questions to which Complainant failed to provide adequate responses. Complainant's non-selection prevented her from career advancement and additional pay (IF pp 396-397). She alleged that her race was a factor in not being selected because the selectee was Caucasian with less experience. She stated that her age was a factor because selectee was more than 20 years younger than she is (IF p 397).

### **Management's Nondiscriminatory Reasons**

Assuming, for the sake of argument, that Complainant had met her burden to establish a *prima facie* case on the bases claimed, management's responses have been examined and found to be legitimate and nondiscriminatory. Specifically, management's witnesses asserted the following reasons:

Mr. Alaweih declared that he served as the Panel Chair and selecting official for the hiring action at issue. He is the second-level approving official for the position at issue. Ms. Coffee and Ms. Carroll also served on the hiring panel. The panel selected seven candidates for interviews based on their interview score. Complainant received an interview for the position and placed 7 out of 7 in the interview scoring. The panel selected Ms. Schlauch for the position because answered the interview questions

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regarding publications with more detailed answers than Complainant. Years of experience and education did not factor into candidates' interview scores. The selectee had previously served as an intern, but he did not know Ms. Schlauch personally or professionally prior to the interview. He did not know or interact with Complainant prior to the interview. He received HR advice from Mr. Robert Dodge, who reviewed the hiring action (IF pp 405-408; See Interview Scores at IF p 177).

Mr. Alaweih declared that race and age were not issues in the hiring action. He was not aware of Complainant's race and the interview was conducted via voice over Microsoft Teams, and he would not have been able to discern Complainant's race or age from the interview call (IF p 408). He testified that Ms. Schlauch, the selectee, scored highest on the interview portion of the selection rating process. He stated that her interview responses were structured and detailed and provided a better explanation of her leadership experience than the other candidates (IF p 407).

Ms. Coffee declared she served on the hiring panel for the hiring action at issue. The panel agreed to score the resume and interview topics using a point scale. She recalls Complainant interviewed for the position and Complainant's interview responses did not demonstrate she had detailed experience and Complainant did not provide examples of previous experience or fully explain some of the processes at issue (IF pp 414-415).

Ms. Coffee stated that race and age were not issues considered in the hiring action. She stated that she was aware of Complainant's race, but not Complainant's age at the time of the hiring action. She stated that she was not aware of the selectee's race or age at the time of the hiring action. She does not believe that race or age were factors in the hiring action (IF pp 416-417). She stated that the panel recommended the selectee, Ms. Schlauch, because she provided detailed responses during the interview and scored the highest on the interview portion of the hiring action (IF p 416).

Ms. Carroll stated she served on the hiring panel and the panel developed the resume review criteria and interview questions. Ms. Carroll reviewed Complainant's and selectee's resumes and they received the same overall resumes score. Ms. Carroll does not recall if Complainant received an interview during the hiring process (IF pp 422-423).

Ms. Carroll testified that race and age were not raised during the hiring process. She stated that she knew Complainant because she had worked with her in the past, but was not aware of the selectee's race or age (IF pp 425-426). She testified that the selectee provided high quality responses to the interview questions and the panel recommended her because her total aggregate interview score exceeded all the other candidates (IF pp 424).

Ms. Valente, with Human Resources, testified that based upon a review of the selection documentation, that it appeared that the hiring action followed all applicable Agency policies (IF p 429).

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Management's explanations for its actions are reasonable and nondiscriminatory. See *Texas Department of Community Affairs v. Burdine*, 450 U.S. 248, 253 (1981).

### Pretext

It remains for Complainant to show that, in spite of the articulated non-discriminatory explanation, an overall inference of discrimination can be discerned by a preponderance of the evidence. *U.S. Postal Service Board of Governors v. Aikens*, 460 U.S. 711, 714-17 (1983). In other words, Complainant must show that the Army was "more likely motivated by discriminatory reasons, [citation omitted]" than not. *Hill v. Social Security Administration*, EEOC Appeal No. 01970512 (June 8, 2000). Or, Complainant may show that the proffered explanation of the Army is unworthy of credence. *Texas Department of Community Affairs v. Burdine*, 450 U.S. 248, 256 (1981). Essentially, the record must show that the Army articulated a false reason and that its real reason was discrimination. *St. Mary's Honor Center v. Hicks*, 509 U.S. 502, 515 (1993). However, courts have held that it does not matter whether the information upon which management acted was correct. An employer may act for a good reason, a bad reason, or no reason at all, provided that the employer is not motivated by a discriminatory reason. See *Sweeney v. Department of the Army*, EEOC Appeal No. 01942331 (March 10, 1995) citing *Nix v. WLCY Radio/Rahall*, 738 F.2d 1181, 1187 (11<sup>th</sup> Cir. 1984).

At this stage of the analysis, according to the United States Supreme Court, the burden of the Army is not onerous. *Burdine, supra*, 450 U.S. at 254-256. See also *Rosser v. Department of Transportation*, EEOC Appeal No. 01970650 (December 12, 1999). Even if Complainant showed, for the sake of argument only (because Complainant have not done so), that the Army engaged in an action that was an unsound business decision, was unfair, or was motivated by an ill feeling or arbitrariness, that is insufficient to show pretext. *Keyes v. Secretary of the Navy*, 853 F.2d 1016, 1026 (1st Cir. 1988).

Complainant has not shown that the explanation of the Army for its actions was simply a pretext for discrimination. Mere speculation and/or conjecture that the Army had a discriminatory motive without proof are insufficient for proving pretext. See *Autry v. North Carolina Department of Human Resources*, 820 F.2d 1384, 1386 (4th Cir. 1987); ("the fact-finder must not be permitted to engage in surmise and conjecture but rather causation must be shown by probability rather than mere possibility"); *Lovelace v. Sherwin-Williams Co.*, 681 F.2d 230, 241-46 (4th Cir. 1982). A suspicion or mere allegation of a discriminatory motive is not enough.

Complainant's allegations are general and unspecific as they relate to her efforts to provide a connection between the action taken and unlawful discrimination. They are, furthermore, unsupported by the totality of the record. In other words, there is nothing that shows by a preponderance of the evidence that the legitimate explanations given



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by the Army were pretexts for discrimination. *Hammons v. HUD*, Request No. 05971093, EEOC Appeal No. 01955704 (May 5, 1999).

Other than Complainant's initial assertions, she has presented no direct evidence, no corroborating testimony from another witness, and no documentation which would confirm Complainant's claim that management's actions were based upon her protected group status. Hence, management's nondiscriminatory reasons have not been proven to be a pretext for illegal discrimination.

### **Conclusion**

Pursuant to my authority to decide this matter on behalf of the Secretary of the Army, I find that Complainant was not the victim of discrimination based upon the evidence in the case file and for the reasons cited above.

Since Complainant is not a prevailing party she is not entitled to any relief, including attorney's fees or costs. Moreover, attorney's fees are not payable during the administrative processing of age discrimination complaints.

If Complainant is not satisfied with this decision, her appeal rights follow:

### **APPEAL RIGHTS**

1. Complainant may file a Notice of Appeal with the Equal Employment Opportunity Commission (EEOC or Commission), Office of Federal Operations (OFO) at any time up to thirty (30) calendar days from receipt of this Final Agency Decision (FAD). The appeal may be filed via the EEOC's Public Portal, U.S. mail, or hand-delivery.

- a. Appeals submitted electronically should be completed by visiting the Federal Sector EEO Portal at <https://publicportal.eeoc.gov/portal/login.aspx>. **See warning below and detailed instructions** (Enclosure 1).

### **WARNING!**

**Attorneys and non-legal representatives MUST NOT use the EEOC Public Portal to file appeals on behalf of their clients because the system will incorrectly list the representative as Complainant. Therefore, complainants MUST file appeals themselves through the EEOC Public Portal, regardless of whether they are represented.**

- b. Appeals submitted by mail should be completed by using EEOC Form 573 (Enclosure 2) and forward to:

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Director  
U.S. Equal Employment Opportunity Commission  
Office of Federal Operations  
P.O. Box 77960  
Washington, DC 20013  
Fax No. 202-663-7022

c. As an alternative to mailing the appeal, the appeal may be hand-delivered to:

Equal Employment Opportunity Commission  
Office of Federal Operations  
One NOMA Station  
131 M Street N.E., Suite 5SW12G  
Washington, DC 20507-0004

**Complainant may opt to have all submissions and communications between the parties in this matter and the EEOC OFO submitted and communicated digitally, via the Public Portal/FedSEP at <https://publicportal.eeoc.gov/Portal/Login.aspx>. The EEOC OFO will otherwise communicate with Complainant by U.S. Mail.**

2. Any statement or brief in support of Complainant's appeal must be submitted to the OFO within 30 calendar days of filing the notice of appeal. The OFO will accept statements or briefs in support of an appeal by facsimile transmittal, provided they are no more than 10 pages long.

3. At the same time information is provided to the Commission, the Complainant **MUST** also furnish a copy of the appeal, and any supporting statements or briefs, to the Agency. In or attached to the appeal and any supporting statements or briefs to the Commission, the Complainant **MUST** certify the date and method by which service was made to the Agency, in this case the Directorate of EEO Compliance and Complaints Review (EEOCCR), at the address below:

Department of the Army  
Equal Employment Opportunity Compliance and Complaints Review  
ATTN: SAMR-EO-CCR  
5825 21<sup>st</sup> Street  
Building 214, Room 129  
Fort Belvoir, VA 22060-5921  
Fax No. (703) 805-8722  
Email: [usarmy.pentagon.hqda-asa-mra.mbx.eeoccr@army.mil](mailto:usarmy.pentagon.hqda-asa-mra.mbx.eeoccr@army.mil)

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**Submissions to EEOCCR may be made either by U.S. Mail or by emailing the EEOCCR Emailbox. The EEOCCR will communicate with Complainants via email when available, using U.S. Mail when Complainant's email address is unavailable.**

Please also furnish a copy of the appeal and supporting statements or briefs to the Agency Representative at the address listed on the Certificate of Service (Enclosure 3) at the same time they are filed. The regulation providing for appeal rights is contained in Title 29, C.F.R., Part 1614 Subpart D. The Code of Federal Regulations is available at <https://www.eeoc.gov/eeoc-regulations>.

4. The thirty (30) calendar day time period within which to appeal will be calculated from the date of receipt of this FAD. If Complainant is represented by an attorney of record, the thirty (30) calendar day time period within which to appeal shall be calculated from the date of receipt by the attorney. In all other cases, the time within which to appeal shall be calculated from Complainant's receipt of the FAD.

5. If an appeal is not filed within the prescribed time limit, it may be dismissed as untimely by the Commission. The Commission will deem the appeal filed on the day it is faxed, delivered in person, or postmarked. In the absence of a legible postmark, the appeal will be deemed filed on the date it is received.

#### **CIVIL ACTION**

1. Deadline to File Suit. In lieu of an appeal to the Commission, Complainant may file a lawsuit in the appropriate United States District Court.

Complainant is authorized under Title VII, the Age Discrimination in Employment Act (ADEA), and the Rehabilitation Act to file a civil action in an appropriate United States District Court:

- a. Within ninety (90) calendar days of receipt of the FAD on an individual or class complaint if no appeal to the Commission has been filed;
- b. Within ninety (90) calendar days of receipt of the Commission's final decision on appeal; or,
- c. After 180 calendar days from the date of filing an appeal with the Commission if there has been no final decision by the Commission.



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Complainant must file the lawsuit **WITHIN NINETY (90) CALENDAR DAYS** of the date of receipt of this FAD, unless Complainant has appealed the case to the Commission. Failure to file a lawsuit within ninety (90) calendar days of receipt of this FAD may result in the dismissal of the suit. Filing a civil action shall terminate Commission processing of the appeal. If a private suit is filed subsequent to the filing of an appeal, the parties are requested to notify the Commission in writing.

2. **Special Deadline for Age Discrimination Civil Actions.** As to any claim based on the Age Discrimination in Employment Act of 1967 (29 U.S.C. 633a), not only must Complainant file suit within ninety (90) calendar days of receipt of this decision, Complainant **MAY** only have **SIX YEARS FROM THE DATE OF THE ALLEGED DISCRIMINATION TO FILE** allegations of age discrimination in a lawsuit. See, 29 U.S.C. 633a (f); and 28 U.S.C. 2401. Filing an appeal to the Commission will not stop that time from running. Complainant may be barred from filing such a suit, should she allow the time limit to expire, even if she has an appeal in progress with the Commission.

3. **Proper Defendant.** Complainant is further notified that if she files a civil action, she **MUST** name the appropriate Department or Agency head as the defendant and his or her official title. **DO NOT NAME JUST THE AGENCY OR DEPARTMENT.** Failure to name the head of the Department or Agency or to state his or her official title may result in the dismissal of the case. The appropriate agency is the Department of the Army. The head of the Department of the Army is the Honorable Christine E. Wormuth, Secretary of the Army.

### **RIGHT TO COUNSEL**

If Complainant chooses to file a lawsuit and does not have an attorney or is unable to obtain one, she may request the court to help Complainant locate an attorney to represent Complainant. The clerk's office of the nearest U.S. District Court is the best place to contact in order to find out if the court can help Complainant locate an attorney. If Complainant cannot afford an attorney, the clerk's office will explain how Complainant may request the court to appoint an attorney to represent Complainant without payment of any fees or costs. If Complainant needs this kind of help, Complainant should contact the court as soon as possible, but no later than ninety (90) calendar days from the date Complainant receives this FAD. **THE NINETY (90) CALENDAR DAYS TO FILE SUIT WILL NOT BE EXTENDED WHILE COMPLAINANT ATTEMPTS TO OBTAIN AN ATTORNEY. IF COMPLAINANT IS GOING TO FILE A LAWSUIT, COMPLAINANT MUST DO SO WITHIN NINETY (90) CALENDAR DAYS WITH OR WITHOUT AN ATTORNEY.**

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**Docket Numbers**

The docket numbers identified on Page 1 of this letter should be used on all correspondence.

Sincerely,

*Spurgeon A. Moore*

Spurgeon A. Moore  
Director, Equal Employment Opportunity  
Compliance and Complaints Review

Enclosures

# Exhibit B

Andrea West  
21808 McCormick  
Grosse Pointe, MI 48236

**Contact Phone:** (313) 655-5380

**Work Phone:** (586) 282-5548

**DSN:** (312) 786-6340

**Email Address:** andi.west@us.army.mil

## EXPERIENCE

**09/2018 to Present**, 40 hours per Week; Technical Writer-Editor; GS-1083-12; last promoted 03/2007; permanent employee; not on a temporary promotion; U.S Army Tank-Automotive and Armaments Command (TACOM). Warren, 6501 E. 11 Mile Rd Warren, MI 48397-5000; Alvis Goss, 586-282-0717; may contact supervisor

As senior Technical Writer-Editor, I have created Technical Publication for 15 years that are driven by Maintenance Planning/Concept. Maintenance Planning/Concept drives the LSA 056(Failure Mode, Effects & Criticality Analysis-FEMCA) Report which creates Troubleshooting Tracks, LSA 036 (Report Provisioning Master Record-PMR) which creates the Repair Parts Special Tools (RPSTL) and the LSA 004 report drives the Maintenance Allocation Chart (MAC). LSA 13 drive the Preventive Maintenance (PMCS) which creates the Work Packages for the Technical Manual. As Senior Subject Matter Expert (SME) lead Verifications and Logistics Demonstrations to support Deployment Equipment PSID, Special Kit Outfits Tools (SKOT), and Robotics and PM SKOT group. I have met tight deadlines on complex programs such Fire Suppression Refill system (FSRS) w/multiple deliverables for the PSID SKOT to PM. I have 15 years of specialized experience as a Technical Writer-Editor which includes utilization of Publications Military to coordinate all aspects of the development of comprehensive technical documents, including, but not limited to, operator and field level maintenance Technical Manuals (TMs), Repair Parts and Special Tool Lists (RPSTLs), Modification Work Orders (MWOs), National Maintenance Work Requirements (NMWRs), and Technical Bulletins (TBs) in accordance with multiple DoD, Army, and AMC regulations, such as AR 25-30, AR 750-1, AR 750-10, AMC-R 25-76, AMC-P 25-31, MIL-STD-40051 (1/2), MIL-STD-2361, MIL-HDBK-1222, MIL-PRF 32216, and MIL-PRF-63002. I have Plan, schedule, and conduct necessary studies to obtain information for Robotics (ALUGS/ UGV) new Video Contract language which resulted in development logistics Scope of Work(SOW) language for all new Robotics contracts. The New Contract Data Requirement List (CDRL) also assisted with completeness and accuracy in support of mission requirements for Electronic Technical Manual (ETM) and Video Technical Manuals (VTM) creation for Robotics. I was responsible for execution of multiple publications for the Force Projection Robotics and Unman Ground Vehicle (UGV) programs, including the Squad Multipurpose Equipment Transport (S-MET), Man Transportable Robotic System (MTRS), Anti-Personnel Mine Clearing Remote Control (M160), Route Clearance & Interrogation Systems (RCIS). Manage and maintain publications for the Robotics and SKOT PSID in support of U.S. Warfighters, I serve as liaison to multiple government agencies, including DLA, US Air Force (USAF), US Marine Corps (USMC), Training and Doctrine Command (TRADOC), Combined Arms Support Command (CASCOM), Army Test and Evaluation Command (ATEC), Tank Automotive Research Development and Engineering Center (TARDEC), Maneuvers Support Center of Excellence (MSCoE), and Army depots for Army Publications. I have developed and published XML Content for several SKOT the Rigid Inflatable Boat (RIB), FSRS, Family Of Boat Motors(FoBAM). I have supported other Team Member Verification Events for FSRS, RIB, and Metal Working Machine Shop Set (MWMSS). Provides technical advice on overall management of programs and internal operations. Managing a printing plant that produces printing either for the government or private industry customers, Performing production control work in a large printing plant. I have setup and lead the integrated Product Team (IPT) for the following system SKOT PSID, Weapons PSID, Medium Tactical and Heavy Tactical coordination with maintenance team, provisioning, engineering and publications personal in order to develop path forward for obsolescence and maintenance issues.

**07/2016 to 09/2018**, 40 hours per Week; Technical Writer-Editor; GS-1083-12; last promoted 03/2007; permanent employee; not on a temporary promotion; U.S Army Tank-Automotive and Armaments Command (TACOM). Warren, 6501 E. 11 Mile Rd Warren, MI 48397-5000; Linda Stark, 586-467-6701; may contact supervisor.

As senior Technical Writer-Editor, providing lead staff support to the Deployment PSID Special Kit Outfits Tools (SKOT) and PM SKOT group. I have met tight deadlines on complex programs w/multiple deliverables for the PSID SKOT. I am an excellent Technical Writer-Editor who focus on quality, detail and customer service. I organizes material and completes writing assignments with regard to order, clarity, conciseness, style, and terminology in compliance with Military Standards. I am responsible for managing, directing and controlling projects the overall publications program for the PSID SKOT Team. Projects are managed cradle throughout the life cycle of the Weapons System. I plan the writing and revisions of Technical Manuals (TMs) on the PSID SKOT. I act as liaison between the government and contractors to ensure milestones and quality in TM production are maintained according to the contract and government standards. I provide training and guidance to contractors, other government, newly report and current personal in the area of writing publications assuring that the latest concepts and theories relating to publication technology are used in manual development. I provide guidance/training to ensure that accurate, relevant information is communicated at each stage of the product lifecycle concerning publications met in accordance with the established Military

Standards. I provide project planning and execution to integrate logistic policies and procedures which provides technical direction, assistance to supporting customers, concerning Technical Publications in accordance with the established Military Standards. Serves as the publications contract manager with full responsibility for directing the technical aspects, of contracts, with the preponderance of activity in the initial acquisition phase of a product life cycle to ensure all phases of the acquisition strategy requirements are met for Publications. I am responsible for maintenance planning and logistics planning from the concept development phases of publications. I coordinate with other offices to assure planning/execution for special requirements such as maintenance, support facilities, development and availability of training programs, new equipment training teams and training aids for newly developed publications. I represent the organization at conferences/meetings, and or IPT with representatives of AMC, DA, other services /agencies, other TACOM organizations, relative to logistics plan and objectives for support in development of weapon system. I have knowledge of Total Life Cycle Systems Management through training in LOG 350 ,and skills in maintenance planning, supply support and technical data which all are aspects of Publications planning and development .I have submitting complete written products for final publication processing. I have coordinated, reviewing and updating data for Materiel Release documents. I develop and execute Verification Plan(s) for system Logistics Demonstration, in which I am the chair person for. I have knowledge of Foreign Military Sales through Publications transactions. I have knowledge of planning, estimating and scheduling of printing Publications. Analyzes and reviews proposals affecting publishing operations and provides management considerations and recommended actions as well as alternatives. Managing a printing plant that produces printing either for the government or private industry customers; Performing production control work in a large printing plant.

**11//2013 to 11/Present** 40 hours per Week; Technical Writer-Editor; GS-1083-12; last promoted 03/2007; permanent employee; not on a temporary promotion; U.S Army Tank-Automotive and Armaments Command (TACOM). Warren, 6501 E. 11 Mile Rd Warren, MI 48397-5000; James Thomas, 586-282-1385; may contact supervisor

As a Lead Technical Writer-Editor I am responsible for Life Cycle Management, Maintenance Planning, Technical Data, Quality Control, Program and System Management, Leadership, Teaming, Configuration Management, Acquisition, Delegation, Oral and Written Communication, working with all Crew Serve Weapons Team. Brief Logistics issues during the IPT meetings while participating in weekly teleconferences with contractors and TACOM IPT key personnel to provide technical assistance while assisting the management of the Crew Serve program(s). Work directly with other IPT members to work towards the common goal of attaining material release objectives. Respond to technical inquiries from the field in an accurate and timely manner. Developed and reviewed Scopes of Work (SOW), SOUMs, MAMs, Technical bulletins to keep the field informed of all changes when merited. I am responsible for managing, directing and controlling projects the overall publications program for the Crew Serve Weapons Team. Projects are managed cradle throughout the life cycle of the Crew Serve Weapons. Plan the writing and revisions of Technical Manuals (TMs) on the Optics Team. Act as liaison between the government and contractors to ensure milestones and quality in TM production are maintained according to the contract. Provide guidance to contractors, other team members and newly reported personal in the area of writing publications by assuring that the latest concepts and theories relating to publication technology are used in manual development. Provide job training to new and current personal in accordance with the established Military Standards for Publications, to ensure that accurate and relevant information is communicated at each stage of the product lifecycle concerning publications. Provide project planning and execution to integrate logistic policies and procedures which provides technical direction, assistance to supporting customers, concerning Technical Publications. Serves as the publications contract manager with full responsibility for directing the technical aspects, of contracts, with the preponderance of activity in the initial acquisition phase of a weapon system life cycle. Manages all aspects of supply sustainment associated with Optics system. I have applied principles of Life Cycle Logistics functions in support of supply management to Optics and Laser by performing functions in procurement to include disposal of defense system material. Plans and executes supply chain management functions associated with the sustainment of Optics weapon system. I have the ability and knowledge to monitor production through Logistics Modernization Program (LMP). I have knowledge of Major/Secondary Item Management forecasting, demand planning, and supply planning, inventory management and process improvement. I am responsible for maintenance planning and logistics planning from the concept development phases of the life cycle Crew Serve Weapons for publications. Demonstrates a working knowledge of Logistics management system. I have knowledge of Foreign Military Sales through Publications transactions for Crew Serve Weapons. Collects, analyzes, and consolidate data on trends in the printed and electronic published both private and public. Serving as a sales representative for a wide variety of printing equipment; Analyzing the price and cost of preparation and production of printing; Planning, estimating, and scheduling printing on a full-time basis for a variety of publications.

**10/2011 to 11/13** 40 hours per Week; Technical Writer-Editor; GS-1083-12; last promoted 03/2007; permanent employee; not on a temporary promotion; U.S Army Tank-Automotive and Armaments Command (TACOM). Warren, 6501 E. 11 Mile Rd Warren, MI 48397-5000; Patricia K. Horton, 586-282-1385; may contact supervisor.

As publications expert fully responsible for directing, contracting and controlling the overall publications program for the Optics Team. Control, direct and manage the publication verification process throughout the life cycle of the Optics. Plan the writing and revisions of Technical Manuals (TMs) on the Optics Team. Act as liaison between the government and contractors to ensure milestones and quality in TM production are maintained. Provide guidance to contractors and, other team members and newly reported personal in the area of writing publications by assuring that the latest concepts and theories relating to publication technology are used in manual development. Provide job training to new and current personal in accordance with the



established Military Standards for Publications. Prepare contract packages for future procurements involving Optics, Laser. Interpret engineering drawings, blueprints and schematics to aid in maintaining technical accuracy in TM development. Monitor all Optics publications for which the contractor is responsible by detecting problems that can result in poor quality or inadequate publications. Conduct conferences and meetings for the resolution of publications-related problems. Perform quality assurance checks on all publications for quality before releasing to TACOM Unique Logistic Support Application (TULSA) system. Has strong capability for problem resolution, management and reports to supervisor expected time and completion of work maintain records of accomplishments for Optics Publications. Performs extensive publications management duties such as editing, clear and concise technical writing, and storage. Skills include: SGML / XML, Adobe, Arbor Text, Epic-Editor, Photoshop, Frame Maker. Current management responsibilities include that is designed to convert paper, PDF, and SGML publications into XML for U.S ARMY systems. Responsible with providing program management support of current and future Information Technology that includes Interactive Electronic Technical Manuals (IETMS), SGML/XML, PDF and paper publications and logistic integration of new technologies to CROWS team. Represents Project Managers Office at conferences or meetings with representatives of AMC, DA, other services, foreign countries and private industry, relative to logistic plans and objectives for Publications. Serves as the publications contract manager with full responsibility for directing the technical aspects, of contracts, with the preponderance of activity in the initial acquisition phase of a weapon system life cycle. I am responsible for maintenance planning and logistics planning, from the concept development phases of the life cycle Optics publications. I have the knowledge and ability to develop/execute Logistic Plan through completing plan for the M25 Binocular system for Optics and Laser team for changing the overall structure due to inquiries from the field. I have knowledge of Foreign Military Sales through Publications transactions for Optics and Lasers. Initiates special and projects to evaluate and improve operational and program efficiencies. Prepare and present formal written and oral presentations to management and customers to promote awareness and recommendation adoption of new processes. Printing processes and equipment and their capabilities, limitations and applicable uses; Industry-wide product design standards, publishing standards, electronic and digital publishing systems, including source file management, standard file formats, markup languages, concept and use of a core repository, and electronic composition and delivery to ensure products conform to all legal and regulatory requirements; Interpreting federal printing, binding and acquisition regulations and procedures.

11/2010 to 10/2011; 40 hours per Week; Technical Writer-Editor; GS-1083-12; last promoted 03/2007; permanent employee; not on a temporary promotion; U.S Army Tank-Automotive and Armaments Command (TACOM). Warren, 6501 E. 11 Mile Rd Warren, MI 48397-5000; Charles Carroll, 586-282-4338; may contact supervisor.

Performed as Lead Technical Writer-Editor and Subject Matter Expert (SME) for the Logistics Demonstration and for the Validation/Verification (100% was completion) of both the operators manual and maintenance manual. Worked with Equipment Specialist on the conversion of the Weapons technical manual to convert from 4-level to 2-level maintenance and put into to an Electronic Technical Manual (ETM). Worked with Equipment Specialist toward the validation/verification (VAL/VER) on the Crew Serve. Work with contractor facilities to insure the contractors validation process will meet standards and help eliminate potential issues during the Val/VER process. Expert knowledge of the technical manuals in order to develop, coordinate and oversee validation and verification of contractor-developed technical data, technical manuals and logistics support packages.

Resulting in resolution major sustainment issues, establishment of processes address logistics burden & resulting in logistics footprint reduction. Consistent coordination application of process improvement to the LOGDEMO (validation & verification of contractor-developed technical data, technical manuals & logistics support packages) process resulted in successful authentication of 6 of manuals for Palletized Load System (PLS), Family of Medium Tactical Vehicles (FMTV), (LHS, EXVAN, AC COTS, LTAS, LSAC TB x 2, 10 Ton Dump, all included fleet updates to existing fleet) all of which supported FMR &/or directly supported GWOT & Operational Readiness improvement for the FMTV Fleet. Monitor all FMTV publications for which the contractor is responsible by detecting problems that can result in poor quality or inadequate publications. Conduct conferences & meetings for the resolution of publications-related problems. Perform quality assurance checks on all publications for quality before releasing to AEPS system. Expert in problem management & resolution. Perform extensive publications management duties such as editing, clear & concise technical writing, & storage of SGML & XML sourced data. Serves as the Publications Manager of a level III weapons system for FMTV FOV which includes LTAS which is a new & innovative complex billion dollar system that has high level visibility to TACOM management & to the Army. Serves as the publications contract manager with full responsibility for directing the technical aspects, of contracts, with the preponderance of activity in the initial acquisition phase of a weapon system life cycle. Prepared SOW for FMTV Engine for repair contract to Red River Army Depot. As an acting team leader for the FMTV FOV, I coordinate the activities of a multifunctional team of 10 members, which includes Logistics Management Specialists, Equipment Specialists, Inventory Management Specialists, & Supply Management Specialists. While acting as team leader, assigned work & provided technical advice, guidance, review the work & provide training to the team members if necessary which has help FMTV to equated quality products. Represent the team w/ management, DA, & other customers through team meetings, briefings, & correspondence. Serve as a facilitator for team meetings, setting team goals & objectives, evaluate customer needs, develop plans to improve team performance & meet customer needs. I am responsible for the Integrated Logistics Support of the FMTV which is very broad & complex program to meet criteria by supporting the detailed logistic milestones schedules that are given by the PM MTV Office. I evaluate, review technical publications for sustainment & production for Engineering Change Proposals content. Mastery the concepts & skills for

a weapon systems life cycle management to assure FMTV meets & maintain the logistics portion of contingency for the mobilization of new vehicle systems. I answer customer (field Army, Project/Product Managers, contractor) inquiries about the FMTV. I evaluate Logistic status/readiness of the FMTV & take corrective action for existing problems. I provide advice on work methods, practices & procedures, & assist the team and or individual members in identifying viable solutions. I assist the team in identifying, distributing & balancing the workload & tasks among the team members, in accordance w/ established work skills, skill level &/or occupational specialization. Make the necessary adjustments to accomplish the workload in accordance w/ established priorities to ensure timely accomplishment of assigned team tasks. Write a Safety of Use Message, in the absence of qualified equipment specialist. Have trained team members & worked w/ individuals to accomplish tasks or projects. Report & monitor the progress of work, to the supervisor as needed. I advise the group leader of the training that will help to better the team. I have written Justification an Approval for FMTV engine rebuild. Acts as Integrated Product Team member w/knowledge of Material Release control concepts & operating procedures. Maintains continuous liaison with concerned personnel to fully coordinate pertinent information relative to assigned programs for Publications. I am responsible for maintenance planning and logistics planning from the concept development phases of the life cycle Family Medium Tactical Vehicles for publications. I have knowledge of Foreign Military Sales through Publications transactions for Medium and Heavy Tactical Vehicles. Determining specifications for the printing of manuscript, i.e., selection of typography, layout, composition, format, paper stock, and other printer's instructions; Negotiating or administering contracts for procurement of manuscript and illustrations, printing, binding and allied services, or printing stocks. Experience with the requirements and limitations of the various contracts issued by the Government Publishing Office (GPO)

**07/05/2010 to 11/16/2010.** Hrs per week: 84, Communication Information Officer, GS-12, U S ARMY

As a Chief Communication Information Officer, I performed remarkably well while serving as the Chief Information Officer (S-6) for the 402nd AFSB South, in support of Operation Enduring Freedom & Operation Iraqi Freedom. My scope of duties & responsibilities covered several critical areas which were vital for the Brigade to perform its mission. Support Operation Enduring Freedom /Operation Iraqi Freedom by covering several critical areas which were areas to include; Customer Service, management, ability to monitor, support of Brigade South Automation, Communications and Visual information systems. As an S-6, I supervised the workload of seven contractors which provide information technological services to soldiers, contractors, civilians, 402nd AFSB Kuwait Headquarters and JPO MRAP. As S-6 for Kuwait I provided my expertise in all areas of information technological areas at command meetings, IPRs and customer service which my team in successfully providing communications to all customers. Provide guidance/direction for 402<sup>nd</sup> AFSB, S-6 division, this guidance is generally accomplished as a briefing to the specific units up to the O-6 level and site recommendation for telecommunications equipment. Establishes and maintains liaison with foreign government personnel and key personnel within the Security Assistance community. Represents the organization at conferences or meetings with representatives of AMC, DA, other services and agencies, other TACOM organizations, foreign countries, relative to logistic plans and objectives. I managed, planned, directed and coordinated the execution of install fiber to JPO MRAP installation in Kuwait. Issued Hand Receipts for equipment given to the customer. I am a talented individual & will continue to be a great asset to any organization due to my military experience, education, Technical Writer-Editor skills. Program and product management principles, forecasting, distribution methods, federal budget process, production scheduling and estimating techniques to perform program and product planning activities.

**03/2007 to 06/30/2010;** 40 hours per Week; Technical Writer-Editor; GS-1083-12; last promoted 03/2007; permanent employee; not on a temporary promotion; U.S Army Tank-Automotive and Armaments Command (TACOM). Warren, 6501 E. 11 Mile Rd Warren, MI 48397-5000; John Eynon, 586-282-4338; may contact supervisor.

Serve as publications expert fully responsible for directing and controlling the overall publications program for the Family of Medium Tactical Vehicles (FMTV) which includes High Mobility Artillery Rocket System (HIMARS), Low Signature Armor Cab (LSAC) and Long Term Armor Secure (LTAS). Control, direct and manage the publication verification process throughout the life cycle of the FMTV. Plan the writing and revisions of Technical Bulletins (TBs), Technical Manuals (TMs), Supply Publications and most other manuals on the FMTV. Act as liaison between the government and contractors to ensure milestones and quality in TM production are maintained. Provide guidance to contractors in the area of writing publications by assuring that the latest concepts and theories relating to publication technology are used in manual development. Prepare contract packages for future procurements involving FMTV. Interpret engineering drawings, blueprints and schematics to aid in maintaining technical accuracy in TM development. Monitor all FMTV publications for which the contractor is responsible by detecting problems that can result in poor quality or inadequate publications. Conduct conferences and meetings for the resolution of publications-related problems. Perform quality assurance checks on all publications for quality before releasing to AEPS system. Has strong capability for problem resolution, management. Performs extensive publications management duties such as editing, clear and concise technical writing, and storage. Skills include: SGML / XML, Adobe, Arbor Text, Epic-Editor, Photoshop, Frame Maker. Current management responsibilities include that is designed to convert paper, PDF, and SGML publications into XML for U.S ARMY systems.

Responsible with providing program management support of current and future Information Technology that includes Interactive Electronic Technical Manuals (IETMS), SGML/XML, PDF and paper publications and logistic integration of new technologies.

**09/2004 to 03/2007;** 40 hours per Week; Technical Writer-Editor; GS-1083-11; last promoted 09/2006; permanent employee; not on a temporary promotion; U.S Army Tank-Automotive and Armaments Command (TACOM), 6501 E. 11 Mile Rd; Cathy Jackson 586-574-4136. ; may contact supervisor.

As a newly reported Technical Writer-Editor I have identified and evaluated current and potential procedures for Technical Writing procedure and policies. I have developed and improved training for Writers by assisting in creating concepts to train all newly report Technical Writer-Editor due to no valid training for Technical Writer-Editors I assist in the development and sustainment of weapon system technical manuals. Perform quality publications quality assurance experience. The ability for extremely clear and concise presentation of highly technical information. Has strong capability for problem resolution, management. Performs extensive publications management, editing, clear and concise technical writing, and storage. Skills include: SGML / XML, Adobe, Arbor Text, Epic-Editor, Photoshop, Frame Maker. Current management responsibilities include \$11 Million Dollar Native American Data Conversion Program, (NADCP) that is designed to convert paper, PDF, and SGML publications into XML for U.S ARMY systems. Responsible with providing program management support of current and future Information Technology that includes Interactive Electronic Technical Manuals (IETMS), SGML/XML, PDF and paper publications and logistic integration of new technologies. Assigned to OMNIBUS contract for Two Level Maintenance as Technical Writer-Editor liaison for ILSC to provide detailed planning and complete analysis necessary to develop and deliver the data for Logistics Management Information (LMI) input and Publication development for TACOM LCMC managed systems cover in the first phase of the TLM Plan. Serves as the publications contract manager with full responsibility for directing the technical aspects, of contracts, with the preponderance of activity in the initial acquisition phase of a weapon system life cycle. Maintenance planning and logistics planning from the concept development phases of the life cycle.

**02/1999 to 06/2003;** 40 hours per Week; Sr. Systems Technician; \$25 per Hour; last promoted Not Specified; permanent employee; not on a temporary promotion; Tech Team Global, Southfield, MI ; Renee Harris , 313 390-2963 ; may contact supervisor

Senior Systems Technician at National Tech Team. Single Point of Contact for tier 1 supplier at Ford Motor Company. Worked w/ Windows 2000, 98, 95, 3.11, and NT. Assisted in maintaining software and hardware support. Duties included Assistant Move Coordinator, Assistant Team Leader, and IP Coordinator. Created and Maintained User Accounts, Network Drives. Troubleshoot Client Software and Server hardware. Evaluated and recommended software and hardware purchases. Performed routine backups and file restoration. Configured and setup Printers, Laptops, Video Conferencing, and Desktop PC's. Duties also included concentrate network drops; Support of Novell platform; Coordinated Office 2000 and Token Ring to Ethernet deployment and support. Scheduled and processed moves w/in Ford Motor Company. Performed memory, processor upgrades on Laptops, Servers, and PC's. Managed the daily operation of helpdesk utilizing Remedy Support. Trained newly hired personnel, and assisted in mentoring program onsite. Provided system support for all Unix-based software. Monitored and troubleshoot desktops and servers running under UNIX. Supported the UNIX environment either via phone or in a desk side role. Responsible for the diagnosis, maintenance and problem resolution of the UNIX network.

**11/1997 to 05/1998;** 40 hours per Week; Field Technician; \$12 per Hour; last promoted Not Specified; permanent employee; not on a temporary promotion; Lockheed Martin, Dearborn, MI 48120; Tim Tierney , 313 317-5000 ; may contact supervisor.

Field Technician Martin for a Tier 1 Supplier. Duties included troubleshooting software and hardware on a ULS server, Windows 95 platform. Taped backup, and restore history on OS2 server. Installed Video, Conferencing units on desktop PC's. Installed Ethernet cards, and hard drives on laptops, and PC's. Managed daily operation of helpdesk utilizing Remedy Support.

**01/1997 to 11/1998;** 40 hours per Week; Associate Helpdesk Technician; \$10 per Hour; last promoted Not Specified; permanent employee; not on a temporary promotion; Olde Discount Financial Corp, Detroit, MI ; Royce Adkins , 313 961-6666 ; may contact supervisor.

Associate Helpdesk Analyst at Olde Discount Financial for Stock Brokers. Olde Discount Stockbrokers Duties included monitoring, and correcting PC problems for 2000 + Users running Windows 3.1. Administered TCP/IP for software distribution using Net wizard. Responsible for network printer maintenance. Developed and tested Cat 5 Cable utilizing Micro-Test cable tester. Pulled cables for PC connection to network. Responsible for performing daily functions on AS400; included rebooting to ensure client financial information posted to the branches. Trained newly reported personnel. Activated Dow Jones News on broker PC; managed daily operation of helpdesk utilizing Magic Support. Managed and coordination of the planning, proposal evaluating/negotiating, and management of production contracts required to support the program goals and objectives

**02/19/1986 to 11/08/1996.** Hrs. per week: 48, Communication Operator/Supervisor, Var-10 -E-5. U S Navy, Various.

Duties included the training and hiring of newly reporting personnel. Installed over 30 automated gateway terminals on the WAN



allowing shore side. Assisted in the development of the policies and procedures regarding the information systems reliability and accessibility. Concentration was in the area of unauthorized access to systems, networks, and data. This was accomplished via systems security evaluations, audits, and reviews. Results of excellent Operational Readiness was earning my Battle E award because of my efforts for our coordination of training program and establishment of policies regulating documentation procedures which earned a passing grade.

While on the USS ACADIA AD42 participated in Operation Earnest Will earning several decorations for the Operation and USS STARK repair. Responsible for daily operation of the Communication Center and physical security of sensitive, Crypto Equipment, Publications, SATCOM and Crypto Keying material. Operated and maintained NAVMAC (V3) Unisys, LDMX UNIX, and NOVA Unisys. Transmitted, received, and processed all forms of telecommunications through various media; operates, monitors, and controls telecommunications transmissions, receptions, terminal, and processes equipment. Performed duties as traffic clerk and watch supervisor; set-up and utilized multi-channel diversity equipment; monitored traffic flow and, if necessary, took corrective action; loaded and prepared computer programs; operated general purpose test equipment; requisitions supplies; maintains maintenance records. Served on the San Diego County Shore Patrol (Military Housing Police) as a dispatcher and housing Patrol Officer. I have gained skills in customer service and the ability to manage Publication and Lead Team(s) through my military training. I have managed print plant procedures and performed production control as being a Communication onboard ship/shore.

## **EDUCATION**

Lawrence Technological University, Southfield, MI ; Master in Dual Master's Business Administration / Global Leadership Management , 2012; 3.40 out of 4.0 Point GPA  
Davenport University, Dearborn, MI; Bachelor in Applied Business, 2003; 2.96 out of 4 Point GPA  
Davenport University, Dearborn, MI; Associate in Associate's Degree w/ certificate Cisco, 2002; 3.50 out of 4 Point GPA  
Edwin Denby High School, Detroit, MI; 1985 High School Diploma

## **PROFESSIONAL LICENSES/CERTIFICATES**

International Business Certificate 12/30/2017- Wayne County Community College  
Global Supply Chain Management Certificate 12/30/2015-Wayne County Community College  
Project Management Certificate 07/26/2007, Lawrence Technological University  
Cisco Certificate 09/27/2001, Cisco, Davenport University  
Network Engineering Management Certificate 12/21/1999, MCSE, Computer Learning Center  
Life Insurance Certificate- 01/07/2022

## **DAU Acquisition Logistics**

Level I, II, III Certification - Completed

## **DAU Program Management**

Level I Certificate-Completed

## **PROFESSIONAL TRAINING**

Business Communication, August 2016, Wayne Community College  
Intro to International Business and Trade, January 2016, Wayne Community College  
Provisioning Training Phase I, August 2016, TACOM  
International Supply Chain Management, 2015, Wayne Community College  
Inventory and Warehouse Management, 2015, Wayne Community College  
Logistics Modernization Program Applications, June 2015 ALMC  
Purchasing, December 2014, Wayne Community College  
Analysis Techniques I, January 2015, TACOM  
Principles of Logistics, 2015, Wayne Community College  
Introduction to Supply Chain Management, August 2014, Wayne Community College  
Materials Management, December 2014, Wayne Community College  
Inventory and Warehouse Management, 2015, Wayne Community College  
Transportation and Distribution, 2015, Wayne Community College  
International Supply Chain Management, 2015, Wayne Community College

Integrated Product Support Training for Logistics Managers, March 2014,  
TACOM Intern Logistics Studies Program Major Item Management, Jun3 2013, TACOM  
Retail Supply 103, April 2015, TACOM  
Intern Logistics Studies Program Secondary Item Management, June 2013, TACOM  
Strategic Management, September 2007 Lawrence Technological University  
Managing Tech and Innovation Global Society, Lawrence Technological University  
Global Org Develop. & Change, January 2008, Lawrence Technological University  
Managing Outsourced Projects, January 2007 Lawrence Technological University  
Managing Project Organization, Lawrence Technological University  
Project Management, January 2006, Lawrence Technological University  
Property Book Unit Enhanced (PBUSE), April 2015, TACOM  
Logistics Modernization Program LMP, TACOM  
Intern Leadership Development Course, 4/11/05-4/15/05, TACOM  
DIDs and CDRLS, 4/19/05, TACOM  
Contracting Officers Representatives, 6/6/05-6/10/05, TACOM  
Defense Distribution Management Course, 6/27/05-7/1/05, TACOM  
Power Log-J Training, 9/10/05-9/11/05, TACOM  
Blueprint Reading, 9/12/06-10/5/06, TACOM  
Logistics Management Development Course, 4/3/06-4/28/06, TACOM

# Exhibit C

## SARAH SCHLAUCH

### TECHNICAL SKILLS:

- Microsoft Word, PowerPoint, Outlook, Excel, Project, OneNote, Arbortext, XML, Google Apps, Microsoft Expression Web, Quark, HTML, Adobe Acrobat, IADs, EMS NG, InDesign, Illustrator, Adobe Experience Manager, and Photoshop.

### EXPERIENCE:

- 02/20 – Present U.S. Army TACOM LCMC, Warren, MI, Hours per week: 40, Series: 0346, Pay Plan: GS, Grade: 12  
Logistics Management Specialist, Supervisor: Matt Spiess (586-282-0875), Okay to contact: (b) (6)
- Assistant Logistics Management Specialist for the Multiple Launch Rocket System (MLRS) under PM Mounted Armor Vehicles (MAV). Responsible for managing all integrated product support elements in relation to system projects in order to maintain cost, schedule, and performance.
  - Helped plan and lead the MLRS A2 IETM verification which utilized Interactive Authoring and Display Software (IADs) and allowed for quick fixes. The verification maintained a 90% "Go" rate and was able to maintain schedule despite COVID-19 complications. Reviewed Repair Part and Special Tools List (RPSTL) for accuracy. Verified that tools and test equipment adequately supported vehicle and were available for Soldiers to use. Worked alongside contractors, DOD personnel, and stakeholders to develop, write, and format training material, operator, and maintenance manuals and other supplemental material for the Soldier.
  - Advised stakeholders and team members on publication policy. Served as subject matter expert of all policies related to publications. Frequently conducted research on matters related to publications and the acquisition lifecycle to advise team on publications related matters. Frequently utilized Military standards, Military specifications, Army Regulations, Army Material Command Regulations, system specific style guides, and the Plain Writing Act of 2010 to provide guidance.
  - Set up and lead the Integrated Product Team (IPT) for the ESPAR V7S heater and coordinated with maintenance team, provisioning, engineering, and publications personnel in order to develop path forward for obsolescence and maintenance.
  - Frequently reviewed Work Directives and contributed performance-based language in order to procure necessary publications, provisioning, packaging, engineering, and test equipment data to support projects.
  - Attended and lead log IPTs weekly. Provided weekly status reports and briefed senior leaders weekly on ongoing projects.

- 08/16 – 02/20 U.S. Army TACOM LCMC, Warren, MI, Hours per week: 40, Series: 1083, Pay Plan: GS, Grade: 12  
Technical Writer-Editor, Supervisor: Sherry McElhane (586-282-7190), Okay to contact: (b) (6)
- Served as lead Technical Writer-Editor for the Mobile Protected Firepower (MPF) Gold Team, M113 Family of Vehicles (FOV), the Opposing Forces Surrogate Vehicle (OSV), and Main Battle Tank (MBT) FOV; responsible for managing the entire publications program for these ground combat vehicle systems, was the lead technical writer on projects that were on the Detroit Arsenal Commanding General's high priority list, and coordinated publications logistic events as needed. Worked alongside contractors, DOD personnel, and stakeholders to develop, write, and format training material, operator, and maintenance manuals and other supplemental material for the Soldier. Reviewed over 3000 pages in under 30 calendar days to assure that it was error-free and clearly usable for the Soldier. Attended briefings with the Commanding General and frequently briefed leadership on logistic activities.
  - Advised stakeholders and team members on publication policy. Served as subject matter expert of all policies related to publications. Frequently conducted research on matters related to publications and the acquisition lifecycle to advise team on publications related matters. Frequently utilized Military standards, Military specifications, Army Regulations, Army Material Command Regulations, system specific style guides, and the Plain Writing Act of 2010 to provide guidance.
  - Developed and edited Request for Proposals, Market Surveys, Start of Works, Scope of Works, Contract Language, Contract Data Requirements Lists, and Data Item Descriptions as needed for new or updated acquisition requirements.

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# SARAH SCHLAUCH

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- Reviewed and analyzed all incoming questions and requests for multiple publications and routed to appropriate location depending on the severity of the request. Retained and stored all DA Form 2028s in a logical database for future use when updating publications. Developed correspondence to Soldiers in the field in response to their maintenance questions or concerns.
- Attended Logistics events to support the M113/OSV/MBT and other systems as necessary to support mission goals. Served as the lead Technical Writer-Editor on multiple successful technical manual verifications that produced authenticated manuals. Maintained control over verifications and served as the SME for publications. Worked alongside the contractor to observe validations and provided comments, edits, and other feedback to the contractor. Served as publications SME for the Armored Multi-Purpose Vehicle (AMPV) logistics demonstration and worked alongside stakeholders to compile edits, issue items, and update the event tracker.
- Oversaw the development, verification, and publication of the A20 Heater Manual which was an In-house publication. Attended IPTs and helped publications manager get the source data needed from the OEM.
- Elected president of the Intern Assistance Network (IAN) which supports all incoming personnel in the Integrated Logistics Support Center (ILSC) at TACOM. Developed training aids for incoming personnel to get them familiar with their job duties. Organized and moderated monthly forums for new and existing interns on various job specific topics. Planned professional and social meetings and forums that were organization wide. Held monthly board meetings and delegated responsibilities to other board members as necessary.

## 06/16 – 08/16 CEB Global, Arlington, VA Web Content Manager

- Worked to combine 5 separate websites into one site for CEB's members.
- Coordinated front end web development in line with firm wide web and UX governance.
- Communicated with multiple departments to coordinate site edits.
- Edited content for CEB's member website.
- Responded to urgent requests for updates to the website.
- Used excel to structure big data.

## 02/16 – 05/16 U.S. Department of State, Washington, D.C. Virtual Intern/Writer

- Created content for the State Departments Virtual Fellows Program Facebook page.
- Tailored content for a specific target audience and assess it for readability.
- Gathered data from multiple sources to create one final end product.
- Edited content for publication in accordance with the USG Plain Writing Act of 2010.

## 09/14 – 05/16 Gnovis Journal, Washington, D.C. Peer-Reviewer

- Responsible for editing journal entries for grammar and content in Microsoft Word.
- Provided feedback on entries before publication.
- Strict deadlines to turn in edits.

## 08/14 – 04/16 Georgetown College Deans Office, Washington, D.C. Graduate Assistant

- Compiled and published bi-weekly inner office newsletter.
- Created technical documents for University use.
- Interacted with students on a daily basis and assist them as first POC in the office.
- Filed and maintained organization of an extensive amount of student records.
- Supported all 12 Deans.
- Prepared academic material for students.
- Other aspects of my job included answering phones, delivering mail, and keeping office organized.
- Assisted with commencement. Specific duties included: diploma distribution, organizing students, set up and clean up, and distributing commencement materials to students.

## 11/13 – 08/14 Eliassen Group, Bethesda, MD Office Support Specialist

- Used internal databases (eRecruit and Peoplesoft) to pull data and create daily reports in Excel and Word.
- Formatted resumes for candidates that were then sent out to clients.
- Organized, put together, and edited proposals for clients.

## SARAH SCHLAUCH

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- Edited, organized, and wrote job descriptions.
- Required to compose, edit, and organize multiple reports in Excel daily for managers.
- Planned multiple events for the office.
- Other aspects of my job included answering phones, arranging transportation, coordinating of all of the ordering for my office, and greeting and helping office visitors.

03/13 – 10/13 The Courier Newspaper, Ocean Pines, MD  
Writer/Administrative Assistant

- Required to write, edit, and publish at least two articles each week.
- Paginated the paper each week and then organized it using Quark.
- Edited the paper and sent it to press each week.
- Created many of the pages for the paper in Quark (Classifieds, Events page, Cover page, etc.).
- Edited photos for the paper in Photoshop.
- Required to answer phones, attend local events, and keep track of distribution of the paper.

01/13 – 03/13 The Courier Newspaper, Ocean Pines, MD  
Intern/Writer

- Wrote weekly articles for publication.
- Interviewed members of the community for articles.
- Edited articles for publication.

01/13 – 05/13 Metropolitan Magazine, Salisbury, MD  
Intern/Writer

- Composed and edited articles for the magazine.
- Conducted research for the magazine on topics that were relevant to its readers.
- Required to handle a steady work load with strict deadlines.

12/11 – 01/13 U.S. Department of Justice (DEA), Arlington, VA  
Pathways Intern

- Wrote and edited memos for inner-office personnel.
- Organized research into structured data tables using Excel.
- Set up transportation, organized and filed important documents, and answered phones.
- Obtained a Top Secret security clearance.

### EDUCATION:

2016 Georgetown University, Washington, D.C.

- Master of Arts, English.
- GPA 3.7

2022 (expected) Lawrence Technological University, Southfield, MI

- Master's in Business Administration.
- Concentration in Program Management
- GPA 3.9

2013 Salisbury University, Salisbury, MD

- Bachelor of Arts, English Literature.
- Minor in Business and Professional Writing.
- Member of Lambda Iota Tau honors society.
- Major GPA 3.7

### OTHER TRAINING:

Defense Acquisition University

- DAU Logistics Level I Certified (2017).
- DAU Logistics Level 2 Certification (2019).

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- DAU Logistics Level 3 Certification (4 of 6 classes completed)

Gelardin New Media Center, Washington, D.C.

- Adobe InDesign part I and II.
- Adobe Photoshop part I.

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# West Complaint signature

Final Audit Report

2024-05-16

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By:	Dionne Webster-Cox (dewc@websterlawofficepllc.com)
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-  Document e-signed by Andrea West (awest.estates@gmail.com)  
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